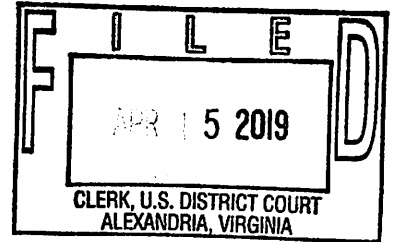


IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Alexandria Division



UNITED STATES OF AMERICA

v.

JARED L. GREENE,

Defendant.

Case No. 1:19-mj-178

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, Officer James Withers, being duly sworn, state the following:

1. I entered on duty with the Security Protective Service ("SPS") of the Central Intelligence Agency ("CIA") in October 2018. Prior to joining SPS, I served as a law enforcement officer in Prince William County, Virginia from July 2012 until October 2018. I graduated from the Prince William County Criminal Justice Academy in December 2012. Following my entry onto duty with SPS, I received an additional eight weeks of CIA-specific training prior to being assigned as an officer at the George Busch Center for Intelligence ("CIA Headquarters") in McLean, Virginia.

2. This affidavit is submitted in support of a criminal complaint charging JARED L. GREENE with criminal trespass at the CIA Headquarters in violation of 32 C.F.R. § 1903.7, which prohibits entering, or remaining on an Agency installation without proper authorization, as well as reentering or attempting to reenter an Agency installation after being instructed not to do so by an authorized person.

3. The facts and information contained in this affidavit are based upon my personal knowledge and observations during the course of this investigation, information conveyed to me by other individuals, including law enforcement officers, and my review of records, documents, and other physical evidence obtained during the investigation. This affidavit contains information necessary to support probable cause, and it is not intended to include each and every fact and matter observed by me or known to the government.

4. On April 14, 2019, at approximately 3:05 p.m., CIA SPS Officers encountered a green 2001 Ford Explorer bearing Georgia plates stopped on CIA property, in front of a closed gate, at the George Bush Center for Intelligence in McLean, Virginia, within the Eastern District of Virginia. The vehicle was facing a sign which read in relevant part:

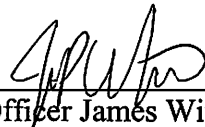
“WARNING
RESTRICTED
U.S. GOVERNMENT
INSTALLATION
EMPLOYEES AND OFFICIAL VISITORS ONLY
IT IS UNLAWFUL TO ENTER
OR ATTEMPT TO ENTER
THIS INSTALLATION WITHOUT
PROPER AUTHORIZATION.”

5. When SPS Officers approached the defendant, he immediately stated that he wanted to speak to someone about being involuntarily injected, as well as assaults on him and his family. Officers asked the defendant to produce identification, and he produced a Georgia driver's

license. Upon a search of records, officers determined that the defendant had previously been issued a written warning for trespassing on an Agency installation. After determining that the defendant was not an authorized visitor, officers asked the defendant to leave the premises, and the defendant refused. SPS Officers then arrested the defendant for trespassing on an Agency installation.


6. On one prior occasion, on March 22, 2019, the defendant trespassed at the CIA Headquarters. The CIA SPS officer involved in this prior encounter issued a written warning instructing the defendant not to return or to reenter onto the CIA Headquarters installation. The defendant was also notified that he could be cited or arrested if he returned.

7. Based on the foregoing, I submit there is probable cause to believe that on April 14, 2019, within the Eastern District of Virginia, JARED L. GREENE did enter and remain on an Agency installation without proper authorization in violation of 32 C.F.R. § 1903.7.



Officer James Withers
Security Protective Service
Central Intelligence Agency

Subscribed and sworn to before me
This 15th day of April 2019.

_____/s/ 
John F. Anderson
United States Magistrate Judge

Honorable John F. Anderson
United States Magistrate Judge
Alexandria, Virginia